

JACK C. SCHECTER  
T 617 443 9292 x281  
JSCHECTER@BROMSUN.COM

November 10, 2004

**VIA FACSIMILE AND MAIL**

Paul E. Bonanno, Esq.  
Choate, Hall & Stewart  
Exchange Place  
53 State Street  
Boston, MA 02109-2804

Re *ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al.*, Docket No. 04-10353(PBS)  
Our File 2639/509

Dear Paul:

This letter responds to the points raised in your November 1, 2004 letter.

First, ScanSoft is not in a position to specifically identify the additional Voice Signal products that infringe the '966 patent because Voice Signal has failed to provide information concerning the differences between the VSuite product found in the infringing Samsung VGA1000 cell phone and the additional versions of VSuite (VSuite 1.0, VSuite 1.1, VSuite 1.2, and VSuite 1.3). Based on Voice Signal's representation that these differences are "insubstantial and immaterial" and on ScanSoft's knowledge of the VSuite line of products, ScanSoft believes each version of VSuite infringes the '966 patent as illustrated in the claim chart included in ScanSoft's response to Voice Signal's Interrogatory No. 1. ScanSoft will supplement this response when Voice Signal produces information concerning the operation of and functional differences between the VSuite product found in the infringing Samsung VGA1000 cell phone and each of the additional versions of VSuite.

Second, regarding Voice Signal's request for documents supporting ScanSoft's damages claim, ScanSoft has produced the relevant responsive documents in its possession and will supplement its response as necessary. As stated in my October 21, 2004 letter, Voice Signal's request that ScanSoft "state with particularity its alleged damages" is premature because Voice Signal has failed to produce the financial and sales documents which ScanSoft needs in order to make this determination and because the determination of a specific

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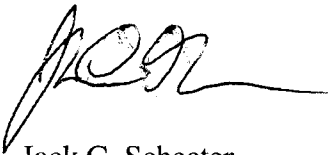
reasonable royalty rate is an appropriate matter for inquiry during expert discovery, which has yet to commence.

Third, as we discussed at our discovery conference during the November 4, 2004 status conference, ScanSoft will agree to participate in a mutual exchange of technical documents, including source code, at an agreed upon time.

Finally, with respect to documents concerning the licensing and sale of its products, ScanSoft has produced the relevant responsive documents in its possession and will supplement its response as necessary.

I trust the above responses resolve the issues raised in your November 1, 2004 letter..

Sincerely,

A handwritten signature in black ink, appearing to read 'JCS', with a long horizontal flourish extending to the right.

Jack C. Schechter

JCS/

Cc: John M. O'Toole, Esq. (via email)